

RICHLAND & FALKOWSKI, PLLC

ATTORNEYS AT LAW

QUEENS COUNTY OFFICE:
28-07 JACKSON AVE 5TH FL
LONG ISL. CITY, NY 11101

ORANGE COUNTY OFFICE:
5 FAIRLAWN DRIVE, SUITE 204
WASHINGTONVILLE, NY 10992

PHONE: (212) 390-8872
FAX: (212) 390-8873
EMAIL: drichland@rflegal.net

July 26, 2022

Via Electronic Filing

Hon. Dora L. Irizarry
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE: *Windward Bora, LLC v. Stuyvesant Construction Corp., et al*
Docket No.: 19-cv-07275(DLI)(CLP)
**Notice of Service of Defendant's Opposition to Plaintiff's Cross-Motion and
Reply to Plaintiff's Opposition**

Your Honor:

I represent the Defendant Stuyvesant Construction Corp. ("Defendant") in the above referenced matter. Pursuant to the Court's June 29, 2022 Order granting Plaintiff's Second Motion for Extension of Time, Defendant has timely served its Opposition to Plaintiff's Cross-Motion and Reply to Plaintiff's Opposition.

Defendant has served the following documents:

1. Defendant's Memorandum of Law in Opposition to Plaintiff's Motion for Summary Judgment and Reply
2. Declaration of Daniel H. Richland, Esq.
 - a. Exhibit 1 – Email from Plaintiff's counsel serving Plaintiff's Opposition and Cross-Motion for Summary Judgment on July 15, 2022.
 - b. Exhibit 2 – Email from Sarah Brayer, Term Law Clerk to the Hon. Chief Cheryl L. Pollak, U.S.M.J. regarding service of Ocwen Financial Corporation's response to the subpoena duces tecum dated October 21, 2020.
 - c. Exhibit 3 – Affidavit in Support of Motion for Summary Judgment in Lieu of Complaint of Yonel Devico dated November 11, 2016 in *Milky Way II, LLC v. Cepedea*, bearing Index No.: 67760/2016 in the Supreme Court of the State of New York, Westchester County
 - d. Exhibit 4 – Email from Plaintiff's counsel in *Windward Bora LLC v. Barrie* confirming that Yonel Devico leases his apartment in Florida
 - e. Exhibit 5 – Yonel Devico's LinkedIn Profile as of February 16, 2022
 - f. Exhibit 6 – Email from Yonel Devico dated May 17, 2017

- g. Exhibit 7 – Deed dated April 14, 2016 conveying 273 North Newbridge Road, Unit D2, Levittown, New York 11756 to Yonel Devico
 - h. Exhibit 8 – Power of Attorney dated April 14, 2016 made by Yonel Devico in favor of the Board of Managers of Newbridge Gardens Condominium
 - i. Exhibit 9 – Satisfaction of Mortgage by Yonel Devico dated January 5, 2018
 - j. Exhibit 10 – Deed dated December 2, 2020 conveying 273 North Newbridge Road, Unit D2, Levittown, New York 11756 from Yonel Devico
3. Counterstatement

I thank the Court's kind consideration and attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "D. Richland", with a stylized flourish extending to the right.

Daniel H. Richland, Esq.